REMARKS

The Office Action dated August 8, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 24, 34, 42, 44 and 45 have been amended to particularly point and distinctly claim the invention. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 20-23 have been cancelled. Claims 1-19 and 24-45 are submitted for consideration.

Claims 1-19 and 24-45 were rejected under 35 U.S.C. 112, second paragraph, as failing to set forth the subject matter which applicants regard as their invention. Specifically, the Office Action alleged that, "wherein the first server provides the service in a **single service stream** to the at least one each second server to be then provided for the plurality of client devices redirected to the at least one second server," as recited in claims 1, 24 and 34, has not been found in the detailed description of the invention. Claims 1, 24 and 34 have been amended to more clearly define the invention and to overcome the rejection. Applicants note that paragraph 0028 of the specification discloses that the main server transfers or redirects some users into additional servers; the main server now has a much smaller number of users (mainly other servers). Paragraph 0031 of the specification also discloses that the main server has now created a distributed server tree with one or more branch servers and a lot of users having a SIP relationship

with these branch servers so that when **a message** is sent to a group, the main server sends **the message** to the branch servers.

Furthermore, figure 4 shows a diagram of a SIP server 40 with a large number of clients. Paragraph 0036 of the specification discloses that figure 4 shows that SIP server 40 redirects one or more clients to SIP server 44. Paragraph 0037 also discloses that figure 5 shows a diagram of a created distributed server tree, where there is **one** communications link from SIP server 40 to SIP server 44 and SIP server 42, respectively, and multiple links from SIP server 44 to clients 45A-45D and from SIP server 42 to clients 46A-46C. Accordingly, based on the disclosure of paragraph 0031, when a single message or event is sent on the link from the SIP server 40 to SIP server 44 and SIP server 42, respectively, the message is replicated from SIP server 44 to clients 45A-45D and from SIP server 42 to clients 46A-46C. Therefore, Applicants submit that the specification does disclose "wherein the first server provides the service in **a single message** to each of the at least one second server to be then provided for the plurality of client devices redirected to each of the at least one second server," as recited in claims 1, 24 and 34. Based on the discussion above, Applicants request that the rejection be withdrawn.

Claims 1-6, 15-19, 24-28, 33-38 and 41-45 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5, 991,809 to Kriegsman (hereinafter Kriegsman). The rejection is traversed as being based on a reference that neither teaches nor suggests the combination of elements recited in each of claims 1-6, 15-19, 24-28, 33-38 and 41-45.

Claim 1, upon which claims 2-23 depend, recites a method including receiving requests for a service at a first server from a plurality of client devices and determining to identify at least one other server to provide the service to at least some of the plurality of client device on the basis of determining that a plurality of client devices are located in particular location. The method also includes creating a resource identifier for the at least one second server. The method further includes redirecting at least some of the plurality of client devices to get the service from the at least one second server. The first server provides the service in a single message to each of the at least one second server to be then provided for the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the first server.

Claim 24, upon which claims 25-33 depend, recites a computer program embodied on a computer readable medium, the computer program causing computing device to receive requests for a service from a plurality of client devices and determine to identify at least one other server to provide the service to at least one of the plurality of client device. The computing device also determines that some of the plurality of client devices fulfill load balancing criteria for providing the service more efficiently via at least one second server and creates a resource identifier for the at least one second server. The computing device further redirects at least some of the plurality of client devices to get the service from the at least one second sever, wherein the server provides the service in a single message to each of the at least one second server to be then provided to some of

the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the computing device.

Claim 34, upon which claims 35-40 depend, recites a server configured to perform receiving requests for a service from a plurality of client devices and determining to identify at least one other server to provide the service to at least one of the plurality of client device. The server also performs determining that some of the plurality of client devices fulfill load balancing criteria for providing the service more efficiently via at least one second server and creating a resource identifier for the at least one second server. The server further performs redirecting at least some of the plurality of client devices to get the service from the at least one second sever, wherein the server provides the service in a single message to each of the at least one second server to be then provided to some of the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the server.

Claim 44 recites an apparatus including a receiving unit configured to receive requests for a service at a first server from a plurality of client devices and a determining unit configured to determine to identify at least one other server to provide the service to at least one some of the plurality of client device on the basis of determining that a plurality of client devices are located in a particular location. The apparatus also includes a determining unit configured to determine that some of the plurality of client devices fulfill load balancing criteria for providing the service more efficiently via at least one second server and a creating unit configured to create a resource identifier for the at least

one second server. The apparatus further includes a redirecting unit configured to redirect at least some of the plurality of client devices to get the service from the at least one second server. The first server provides the service in a single message to each of the at least one each second server to be then provided for the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the first server.

Claim 45 recites an apparatus including receiving means for receiving requests for a service at a first server from a plurality of client devices and determining means for determining to identify at least one other server to provide the service to at least one some of the plurality of client device on the basis of determining that a plurality of client devices are located in a particular location. The apparatus also includes determining means for determining that some of the plurality of client devices fulfill load balancing criteria for providing the service more efficiently via at least one second server and creating means for creating a resource identifier for the at least one second server. The apparatus also includes redirecting means for redirecting at least some of the plurality of client devices to get the service from the at least one second server. The first server provides the service in a single message to the at least one each second server to be then provided for the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the first server.

As will be discussed below, the cited prior art reference of Kriegsman fails to disclose or suggest the elements of any of the presently pending claims.

Kriegsman discloses a collaborative server system for providing high speed data transmission of data files across a communications network which includes a communications network, a primary server having a primary communications component for connecting the primary server to the communications network, and at least one secondary server having a secondary communications component for connecting the secondary server to the communications network. The primary server and the at least one secondary server include storage component for storing data files. The data files include static data files and/or dynamic data files. The storage component of the primary server further stores at least one look-up table having specific criteria pertaining to the data files and the primary and at least one secondary servers. The processor component of the primary server is effective to receive a request for specific data files from a network user, to look-up specific criteria in the look-up table pertaining to the specific data files, and to allocate transmission of each specific data file between the primary server and the at least one secondary server based on the specific criteria. See at least the Abstract of Kriegsman.

Kriegsman further discloses that the system includes at least one computer system that is connected to the communications network and has the capability of sending a request to the primary server. In addition, the processor means of the primary server includes means for determining an optimum server from the group of servers including the primary and secondary server to transmit the duplicate of the static data files to the computer system when two or more servers are available. The criteria for determining

which one of the servers shall transmit includes transmission speed and available capacity of the primary communications means, proximity of the computer system to each server, availability of each server, version of the duplicate of the data file on each server and financial cost of transmitting data from each server. Col. 4, lines 1-15 of Kriegsman.

Applicants submit that Kriegsman does not teach or suggest each of the elements of the pending claims. Each of the pending claims, in part, recites redirecting at least some of the plurality of client devices to get the service from the at least one second server, wherein the first server provides the service in a single message to each of the at least one second server to be then provided for the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the first server. Kriegsman does not teach or suggest these features.

According to claims 1, 24 and 34, the first server receives a plurality of requests from a plurality of clients. The first server then determines that another server is able to provide the service more efficiently to the plurality of clients. Thus, the first server forwards the plurality of requests to the other server in a single request message, wherein the second server processes and responds to each of the plurality of requests. Thus, in the presently pending claims, the primary server **redirects** some client devices to get service from a second server so that the client device can provide service to multiple client devices redirected to the second server by sending a single message to the second server.

Kriegsman, on the other hand, does not teach or suggest redirecting client devices to a second server to obtain services from the primary server through the second server.

Instead, Kriegsman teaches that the processor of the primary server determines an optimum server from a group of servers, including the primary server, to transmit a duplicate of the static data files to a computer system when two or more servers are available. See Col. 4, lines 1-15 of Kriegsman. There is no teaching or suggestion in Kriegsman of redirecting client devices to secondary servers, therefore, reducing the load on the first server, as alleged in the Office Action. Based on the distinctions noted above, Applicants respectfully assert that the rejection under 35 U.S.C. §102(b) should be withdrawn because Kriegsman does not teach or suggest each feature of claims 1, 24, 34 and 44-45 and hence, dependent claim 2, 4-15, 19, 26-33 and 36-43 thereon.

Claims 7-14, 29-32 and 39-40 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kriegsman in view of U.S. Patent No. 6,167,449 to Arnold (hereinafter Arnold). According to the Office Action, Kriegsman teaches all of the elements of the claimed invention except for teaching requesting the address of the at least one second server from a Service Location Protocol server. Thus, the Office Action combined Kriegsman and Arnold in an effort to yield all of the elements of claims 7-14, 29-32 and 39-40. The rejection is traversed as being based on references that neither teach nor suggest the combination of elements recited in each of independent claims 1, 24 and 34, upon which claim 7-14, 29-32 and 39-40 depend.

As mentioned in Response filed on May 9, 2007, Arnold teaches an interface for application programs to use when seeking to interact or browse services provided on a network. The application can browse for network services without being configured with

the Network Layer protocols that are used to communicate with provider of those services. The interface is configured to access any number of service identification protocol (SIP) servers under predefined network protocols. The interface can be configured as a client to SIP servers based on several different combinations of SIPs running over different network protocols. Thus, the different SIP servers can reside in different networks connected to each other using a router and communicate with the interface using their identification and network protocols. The interface receives a request for a type of service and, in response, queries one or more of the SIP servers with which it is configured to communicate. In particular, the interface looks up the type of service in each SIP server's database of registered services. After collecting the entries in the SIP server database that have a field matching the requested service type, the interface returns the result data to the application. Therefore, the interface allows any application to browse for network services without being configured with the network protocol of a service provider.

Arnold does not cure the deficiencies of Kriegsman, as noted above. Specifically, Arnold fails to teach or suggest redirecting at least some of the plurality of client devices to get the service from the at least one second server, the first server provides the service in a single message to each second server to be then provided for the plurality of client device redirected to the at least one second server, therefore, reducing the load on the first, as recited in claims 1, 24 and 34. As mentioned above, the interface of Arnold receives a request for a type of service and, in response, queries one or more of the SIP

servers with which it is configured to communicate and looks up the type of service in each SIP server's database of registered services. After collecting the entries in the SIP server database that have a field matching the requested service type, Arnold teaches that the interface returns the result data to the application. As such, in Arnold the interface allows any application to browse for network services without being configured with the network protocol of a service provider. The interface of Arnold does not redirect at least some of the plurality of client devices to get the service from at least one second server, wherein the first server provides the service in a single message to each second server to be then provided for the plurality of client devices redirected to the at least one second server, therefore, reducing the load on the first server, as recited in claims 1, 24 and 34, and claims dependent thereon. Therefore, Applicants respectfully assert that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Arnold nor Kriegsman, whether taken singly or combined, teaches or suggests each feature of claims 1, 24 and 34 and hence, dependent claim 7-14, 29-32 and 39-40 thereon.

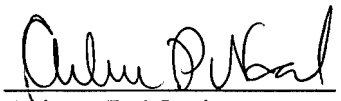
As noted previously, claims 1-19 and 24-45 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1-19 and 24-45 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by

telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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